

Exhibit 1

Proposed Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

)

) Chapter 9

)

) Case No. 13-53846

)

) Hon. Steven W. Rhodes

)

**ORDER GRANTING SYNCORA’S MOTION TO EXCLUDE
THE TESTIMONY OF JOHN W. HILL**

This matter having come before the Court on the motion of Syncora Guarantee Inc. and Syncora Capital Assurance Inc. (“Syncora”) for the entry of an order excluding John W. Hill’s opinions and testimony that (1) revenue estimates in the baseline Ernst & Young forecast for FY 2014-2016 are consistent with estimated revenues in the City’s Revenue Consensus Conference Report and (2) certain estimates of projected expenses and revenues for the restructuring and reinvestment initiatives are reasonable, the Court having reviewed Syncora’s motion; and the Court having determined that the legal and factual bases set forth in the motion establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. Syncora’s Motion to Exclude the Testimony of John W. Hill is
GRANTED.

2. The Debtor, the City of Detroit (the “City”), is precluded from introducing testimony or opinions from Mr. Hill that (1) revenue estimates in the baseline Ernst & Young forecast for FY 2014-2016 are consistent with estimated revenues in the City’s Revenue Consensus Conference Report and (2) certain estimates of projected expenses and revenues for the restructuring and reinvestment initiatives are reasonable.

3. Syncora is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the motion.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IT IS SO ORDERED.
